

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

ALEXIS RICHARDSON
2701 Connecticut Avenue NW, Apt. 100
Washington DC, 20008,

JAY SANDLER,
33 W Huron Street, Apt. 511
Chicago, IL 60654,

LUBNA PESHIMAM,
15 Eastern Drive
West Windsor, NJ 08550,

TRACEY ANN BERTRAND,
11301 NW 34th Place
Sunrise, FL 33323,

MOLLIE KRENGEL,
3420 W 29th Street
Minneapolis, MN 55416,

and

NANCIE LIGON,
64 Woodworth Lane
Sonoma, CA 95476,

Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

L'ORÉAL USA, INC.,
575 Fifth Avenue
New York, NY 10017

Defendant.

No. 13 Civ. 508 (JDB)

**DECLARATION OF COMPLIANCE
WITH CLASS NOTICE PROCEDURES**

Frederick B. Warder hereby declares as follows:

1. I am a member of the firm Patterson Belknap Webb & Tyler LLP ("PBWT"), attorneys for defendant L'Oréal USA, Inc. ("L'Oréal").

2. L'Oreal, by and through its counsel at PBWT, has complied with its notice obligations under Section 3.2 of the Settlement Agreement between L'Oreal and the Plaintiffs ("the Parties") in the above-captioned matter ("the Action").

3. In particular:

(a) On July 11, an insertion order for a Summary Notice was placed in the legal notices section of USA Today. A copy of the insertion order is attached hereto as Exhibit A.

(b) Section 3.2 of the Settlement Agreement required the language of the Summary Notice to be substantially similar to that agreed to by the Parties as part of the Settlement. The language of the Summary Notice is attached hereto as Exhibit B, and was substantially similar to the language agreed to by the Parties.

(c) The Summary Notice ran at 1/8 of a page for four consecutive days, from July 15 – 18, 2013, in the Monday-Thursday edition of USA Today. Copies of each day's advertisements, as they appeared in USA Today, are attached hereto as Exhibit C.

(d) The Summary Notice referred potential Class Members to www.lorealsettlement.com, a website owned and maintained by L'Oreal USA (hereinafter the "Notice Website"). The Notice Website contained additional information regarding the Action, including a copy of the Complaint in the Action, the Settlement Agreement, the Summary Notice, and a Full Class Action Settlement Notice. A screenshot of the Notice Website is attached hereto as Exhibit D. A copy of the Full Class Action Settlement Notice is attached hereto as Exhibit E.

(e) The Notice Website was available for 30 days following the publication of the Notice. The website was deactivated on August 19, 2013.

4. I declare under penalty of perjury that the above is true and correct to the best of my knowledge.

Executed this 19th day of August 2013, in New York, New York.



Frederick B. Warder
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Attorneys for L'Oréal USA, Inc.